

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)	
)	
AMENDEMENT OF PART 97 OF THE)	
COMMISSION'S RULES GOVERNING)	RM-10868
THE AMATEUR RADIO SERVICE)	
)	
PETITION FOR RULE MAKING BY)	
THE RADIO AMATEUR FOUNDATION)	

April 21, 2004

To: The Chief, Wireless Telecommunications Bureau

MY COMMENTS ON THE PETITION FOR RULE MAKING, RM10868

I. Introduction

I have been a licensed operator since 1972. I have an Amateur Extra class license (W8EH), having passed it back when the commission was still administering the exams. I am also a volunteer examiner for the ARRL-VEC. I participate as an instructor for license preparation classes.

II. Radio Amateur Foundation Petition

The "Radio Amateur Foundation" petition has a couple good ideas but is headed down the wrong path. Their plan for the future of amateur radio does not help it grow and adjust to the changing times.

Amateur radio licensing should provide a way for the mainstream and beginner licensees to have significant access to the world wide HF bands. Their petition proposes to keep the Morse code telegraphy requirement for the General and Extra class licenses. I am in favor of keeping it for the Extra class at the 5 word per minute level. But, the General class licensee should not be required to jump the hurdle of the Morse code test. They should have full HF band access without code testing. If they want to learn the Morse code, they will, but that is a small part of what a General class license can do on the HF bands.

The "Radio Amateur Foundation" also states that the beginner class should be the Technician license. Technician is so close to General in technical and testing requirements that they should be merged into one license. The testing on the Technician is also very 'inclusive' and covers many topics that a beginner does not need to know. It does not meet the definition of an entry class license that we need to interest the young people.

They also want to exclude the beginner Technicians from the mainstream bands of 40 and 80 meters. The beginners need to be there, even in a small segment, so that they can interact with the higher class licenses and learn. Also most emergency net operations are here and they would be excluded from that activity.

III. Morse Telegraphy Requirements

Eliminating the code requirement for all licenses –except- Extra class is the way we should go. This will allow all amateurs access to the world wide HF bands. Retaining the morse code requirement for the Extra class will help maintain that telegraphy skill in the amateur service. I don't think eliminating the requirement altogether is the way we should go. But the Radio Amateur Foundation's proposal to keep it for General class is way off the mark.

Their statement in paragraph 18 that Morse telegraphy doesn't keep out the best and brightest is wrong. Being an instructor and volunteer examiner, I can say the telegraphy requirement has kept many down and out and off the world wide HF bands. It kept many completely out of the amateur radio service before the commission saw fit to remove it from the Technician class license.

This should change. Morse telegraphy is but a small part of the HF band activities. I know of quite a few in our local area who want to get on the HF bands to operate voice and digital modes, but can't get over the hurdle of the Morse code testing. Some people just don't have the skills to learn and pass the Morse telegraphy test.

IV. Volunteer Examining Testing

The 'Radio Amateur Foundation' in paragraphs 37 to 47 attempts to prove that the testing system is broken. They are out in left field. I've been a volunteer examiner since the inception of the program by the commission. Yes there may be persons who have the ability to memorize all 500 questions in a pool. But the vast majority of the examinees don't pass by memorizing. They pass by good study and understanding of the majority of the material.

In paragraph 47 they want the commission to require the VEC to implement testing procedures that are for the most part already in place. Our VE team never administers an identical test. Once used it is not used again. If a person requests a re-exam at the same test session, they do get a different test with different questions. It is my understanding that this requirement is already spelled out in part 97.509 (f). Their rule-making request here is redundant.

They also propose to impose a waiting period for retesting. I don't see where this will serve a useful purpose. And how will we be able to ensure that this rule is followed? They just want more hoops for the examinees to jump through and discourage them from getting licenses.

V. Vanity Call System

The Radio Amateur Foundation feels that they vanity call selection system is a privilege that should be earned. This part of their proposal is just silly. It will serve no useful purpose to hold the new hams back from getting a vanity call sign.

VI. Summary

The commission needs to fully address the license structure and morse code requirements in one proceeding. BUT this petition is NOT the one for the future of the amateur radio service.

The petition that the ARRL(RM-10867) has submitted is a better framework for the future of the amateur radio service. I urge you to dismiss the Amateur Radio Foundation petition and act on the ARRL petition.

Respectfully submitted,

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